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Stephen Bergstein
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MEMO ENDORSED
Christopher D. Madans

June 30, 2008

VIA FACSIMILE (914) 390-4095

Hon. George A. Yanthis
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Worthen v. Carpenter & Smith
06 Civ. 3381 (GAY)

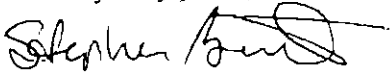
Dear Judge Yanthis:

This firm represents plaintiff in the above-referenced case. I am writing for two reasons:

1. The discovery deadline is July 18, 2008. The parties have diligently pursued discovery and have several depositions that remain between them. In light of my upcoming vacation and trial schedule, the parties do not believe that they can complete discovery by that date. Through this letter, I am respectfully requesting that discovery be extended through September 5, 2008. Counsel for defendant consents to this request.

2. A telephonic status conference has been scheduled for July 8, 2008. As I will be on vacation during that time, I am respectfully requesting that the conference date be re-scheduled after July 14, 2008, when I return from vacation. Counsel for defendant consents to this request.

Very truly yours,


Stephen Bergstein

Telephone conference *agreed*
until 7/17/08 at 9:00 a.m.

cc: Scott Quesnel, Esq.

SO ORDERED:


Hon. George A. Yanthis
United States Magistrate Judge.

6/30/08